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January 18, 2022

By ECF

Hon. Vernon S. Broderick  
United States District Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

APPLICATION GRANTED  
SO ORDERED   
VERNON S. BRODERICK  
U.S.D.J. 01/19/22

Sentencing will be held  
on March 24, 2022 at  
10:00 am

**Re: United States v. Franklin Mejia Martinez**  
**21 Cr. 408 (VSB)**

Dear Judge Broderick,

Mr. Mejia-Martinez appeared telephonically before your Honor on October 12, 2021 and pled guilty pursuant to a written plea agreement to a lesser-included offense of Count One of the above-referenced Indictment charging him with conspiring to distribute heroin and fentanyl in violation of Title 21 U.S.C. § 841(b)(1)(B). Mejia-Martinez is scheduled to be sentenced on January 26, 2022, at 10:00 a.m. For the reasons which follow, I respectfully request that sentencing in this matter be adjourned to a date in March 2022.

As an initial matter, the defense has not yet received the final PSR, which would make it difficult to submit the defense sentencing submission. Regardless, counsel has a number of older sentencing and other matters backed-up already and has not yet gathered all of the letters and other documentation needed to finish the defense sentencing submission in this case. Additionally, I am scheduled to begin a homicide trial in the Bronx on February 14, 2022, which would make it difficult to prepare for, and be ready to proceed on, this sentencing in February.

I have discussed the above with AUSA Rebecca Dell who has *no objection* to this request on behalf of the Government.

Thank you.

Respectfully Submitted,

/s/   
Matthew J. Kluger, Esq.

cc: AUSA Rebecca T. Dell